REMARKS

Please reconsider the application in view of the above amendments and the following remarks.

Disposition of Claims

Claims 1, 5-8, 10, 14-17, and 25-33 are pending in this application. Claims 1, 10, and 22 are independent. The remaining claims depend, directly or indirectly, from claims 1 and 10.

Objection(s)

The specification was objected to for failing to properly cite U.S. Patent Application Serial Nos. 09/039,197 and 09/042,338. The specification has been amended in accordance with the Examiner's suggestions. According, withdrawal of this objection is respectfully requested.

Rejection(s) under 35 U.S.C § 112

Claims 5, 28, and 33 stand rejected under 35 U.S.C. § 112 as indefinite. Claims 5 and 28 have been amended in this reply to clarify the present invention recited in view of this rejection. Further, claim 33 has been cancelled by the reply. Accordingly, withdrawal of this rejection is respectfully requested.

Rejection(s) under 35 U.S.C § 103

Claims 1, 5-8, 10, 14-17, 22, and 25-33 stand rejected under 35 U.S.C. §103 (a) as being unpatentable over U.S. Patent No. 5,898,830 ("Wesinger"). Claim 22 has been cancelled by this reply. Thus, the rejection is moot with respect to cancelled claim 22. This rejection is respectfully traversed with respect to the remaining pending claims.

The present invention as claimed relates to the creation of logical broadcast domains within a computer network that serves to limit access of particular clients to particular network services. Initially, a network client (14) is associated with a physical group of computers. The connection device through which the client computer connects to the computer network may define a physical group. Thus, for example, all client computers within the network associated with customer (14) may define a physical group as they all connected to the computer network through frame relay (32). Each client computer may then be associated with one or more logical broadcast domains within the computer network. Each logical broadcast domain defines the access privileges for all members within the broadcast domain. The logical broadcast domains are implemented using a static route policy.

In contrast, Wesinger is directed towards standard firewall technologies, which are used to prevent unauthorized users from accessing a computer network (*see e.g.,* Wesinger, col. 3, ll. 49-60). Wesinger focuses on preventing unauthorized users from accessing a network by requiring that "all traffic between the two networks must pass through a single point of controlled access." (Wesigner, col. 6, ll. 63-65) While the aforementioned solution is designed to effectively prevent unauthorized users from gaining access to a computer network, it is not designed to be used to limit access of an

authorized user once the user has gained access to the computer network. Further, Wesinger does not teach or suggest using firewall technology to restrict user access *once an authorized user has entered the computer network.* While Wesinger discloses using an internal router to insulate the internal network from the perimeter network, that is not analogous to the present invention as claimed. Wesinger's discussion of adding additional layers of protection, *i.e.,* firewalls, only serve to prevent unauthorized users from *entering* the internal network and not restricting user access of an authorized user *once the user has entered the internal network.*

Further, the present invention as claimed uses a single *static route policy*, implemented across at least two routers to create and manage the logical broadcast domains. In contrast, Wesinger only discloses firewall techniques that are implemented using dynamic filtering and routing. Further, Applicant respectfully asserts that the Examiner's assertion that "static tables containing policy entries" are analogous to a "single static routing policy" is incorrect. Specifically, the static tables disclosed in Wesinger correspond to DNS/DDNS mappings (*see* Wesinger, col. 10, ll. 59-65), while the static routing policy recited in the claims corresponds to a static routing table containing entries which define criteria that is used to grant or deny access to a particular logical broadcast domain (*see, e.g.,* Instant Specification, p. 7, ll. 22-29, and p.8, ll. 15-27). Moreover, the use of the single static route policy is *counter-intuitive* to the approach used in most routing schemes, including the scheme implemented in Wesinger.

In view of the above, claim 1 is patentable over Wesinger. Independent claims 10 and 19 include the same patentable subject matter and thus, are patentable for at least the

same reasons as claim 1. Further, dependent claims are also patentable for at least the same reasons.

Claims 1, 5-8, 10, 14-17, 22, and 25-33 stand rejected under 35 U.S.C. §103 (a) as being unpatentable over U.S. Patent No. 5,898,830 ("Wesinger") in view of "Network Firewall" by Steven M. Bellovin ("Bellovin"). Claim 22 has been cancelled by this reply. Thus, the rejection is moot with respect to cancelled claim 22. This rejection is respectfully traversed with respect to the remaining pending claims.

From the proceeding discussion, it is clear that Wesinger does not teach or suggest the invention recited in the claims. Further, Bellovin does not teach that which Wesinger lacks. Specifically, Bellovin provides a discussion of general firewall technology. However, Bellovin, like Wesinger, focuses on preventing unauthorized users from accessing a network. However, Bellovin does not teach or suggest firewall technology which is designed to be used to limit access of an authorized user once the user has gained access to the computer network. Further, while Bellovin discloses using an internal router to insulate the internal network from the perimeter network, that is not analogous to the present invention as claimed. Bellovin's discussion of adding additional layers of protection, *i.e.,* firewalls, only serve to prevent unauthorized users from *entering* the internal network and not restricting user access of an authorized user *once the user has entered the internal network.* Further, Bellovin does not teach or suggest a static route table as recited in the claims.

In view of the above, claim 1 is patentable over Wesinger in view of Bellovin. Independent claims 10 and 19 include the same patentable subject matter and thus, are

patentable for at least the same reasons as claim 1. Further, dependent claims are also patentable for at least the same reasons.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 09469.002002).

Respectfully submitted,

Date: 7/29/04

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